CONSULTATION QUESTIONS

1. How important do you think it is that we aim to be a Good Food Nation?

See attached

2. How would we know when we had got there? What would success look like?

See attached

3. Do you agree with the proposed vision? How would you improve it?

See attached

4. How would your life be better? What does being a Good Food Nation mean in your locality?

See attached

5. Are there any other essential steps we need to take before setting out on this journey?

See attached

6. How do you think a Food Commission could best help?

See attached

7. In what areas should indicators be set to check we are on track towards our goals?

See attached

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?

See attached

9. Do you agree with the proposed initial focus on:
   - Food in the public sector
• A children’s food policy
• Local food
• Good food choices and
• Continued economic growth?

See attached

10. Which other areas would you prioritise?

See attached

11. What other steps toward achieving a Good Food Nation would you recommend?

See attached

12. What else should be considered?

See attached

13. What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

See attached

14. How did you hear about this Discussion Document?

See attached

Responding to this Consultation Paper

We are inviting written responses to this consultation paper by 17th October 2014. Please send your response with the completed Respondent Information Form (see "Handling your Response" below) to:

goodfoodnation@scotland.gsi.gov.uk

Or by post to:
Good Food Nation
Food and Drink Division
B1 Spur
Saughton House
Edinburgh
EH11 3XD

If you have any queries please contact Eugenia Christie at 0131 244 9574.
INTRODUCTION

Salmon farming is a major contributor to the Scottish food economy and a key part of Scotland’s world-renowned food industry; it accounts for approaching 40% by value of Scottish food exports. Farmed salmon is a huge Scottish success story, an outstanding example of a ‘good food’, both in terms of its exceptional nutritional value and its standards of production. It has been awarded EU PGI status, marking its quality and distinctive origins, and it was one of the earliest international food products to be awarded the coveted French Label Rouge designation. In international polls of salmon buyers held in 2011 and again in 2014 it was voted the ‘Best farmed salmon in the world’.

The Scottish Salmon Producers’ Organisation (SSPO) is thus pleased to respond to the discussion document ‘Becoming a Good Food Nation’ on behalf of Scotland’s salmon farmers in mainland Scotland, Orkney, Shetland and the Western Isles.

GENERAL OVERVIEW

The Scottish Government’s food policy, the first elements of which were launched at the 2007 Highland Show, was further developed in ‘Recipe for Success’ (2009). The policy was designed to realise the potential of the Scottish food and drink sector - expanding its overall value and creating a step change in Scottish exports.

From the time the policy began to be implemented, the sector's figures were testament to its success. Between 2008 and 2011 growth in turnover was 14.4%; between 2007 and 2013 growth in exports was 51%; and between 2007 and 2013 there was a 32% increase in the sale of Scottish brands in Great Britain. Alongside this, cooperation through the industry-led body Scotland Food and Drink has strengthened the business environment across the whole food and drink sector: Scotch whisky and Scottish farmed salmon have led the way.

As we interpret the document, ‘Becoming a Good Food Nation’ now proposes to develop the food policy in three main areas, as follows.

1. There is an important policy strand concerned with creating additional focus on the parts of the food industry which have not yet responded fully to the opportunities for development.
2. There is a clear commitment to further develop the partnership between the Scottish Government and the food and drink industry:
   a. to expand market opportunities;
   b. to promote R&D and skills-development; and
   c. to facilitate continued growth, innovation and business effectiveness across the sector.

3. There is a new policy strand which recognises the global challenges of food security and climate change and the paradox that Scotland, whilst renowned for producing high quality food and drink, has high levels of diet-related disease and associated high health-care costs. The new policy strand thus envisages achieving a healthier, more resilient and more sustainable Scottish food culture, including improvements in the nation’s record on diet and health. In conceptual terms the policy seeks for Scotland to become a ‘Good Food Nation’ not only in the food it produces, but also in the food its population buys, serves and eats.

In that they are business-related objectives, SSPO is wholly supportive of policy strands (1) and (2). The discussion document calls on Scottish food producers to ensure their offerings are ‘fresh, healthy and environmentally sound’. For salmon farmers that concept is already fully embedded in the industry’s culture and standards. The Scottish Government’s approach and restated commitment to the food sector will therefore find widespread industry resonance.

SSPO also supports the broad objectives of policy strand (3), as well as the specific objectives of reducing diet-related disease. However, we recognise that the Scottish Government’s aspiration radically to alter the nation’s food culture and dietary habits represents a huge challenge, not least because it will require changes in behaviour in ‘hard-to-reach’ consumer groups.

Moreover, the problems of diet and health are complex and reflect consumers’ economic priorities, food culture, personal food choices and other behavioural factors such as exercise, as much as, or more than, the quality and variety of the food offered through the supply chain. In these areas we feel that the discussion paper is insufficiently developed and, whilst we wholly support the objectives, we believe much more detailed analysis is required as a basis for planning and action.

On the specific sub-strands of policy set out on page 17, we would make the following constructive observations.

- **Poor diet**: The document is potentially confusing in its use of the terminology ‘poor diet’ (which is the critical consideration in health
management) alongside that of ‘good food’ (or by inference ‘poor food’). It is the amounts and combination of foods in a diet that causes it to be being imbalanced or out of line with dietary recommendations (and thus a poor diet). Additionally, any systematic approach to diet and obesity must pay full regard to lifestyle, and exercise in particular. The fact that average body weight of the population has increased over time in association with a reduction in calorie intake is a fact that should not be disregarded (see *The Fat Lie* by Christopher Snowden, IEA 2014).

- **Many people in Scotland are disconnected from their food:** We fully agree with this observation (but note the phenomenon is not confined to Scotland). We have sought actively to engage with the problem both through our publications and media activity and through the ongoing *Seafood in Schools Programme*. We would fully agree that there is a need for further policy initiative in this area.

- **Food Culture:** This presents a stereotypical view of Scotland, which we believe requires a more detailed geographic and socio-economic analysis. The fact that there are huge differences in life expectancy and other health statistics between near-by Scottish Index of Multiple Deprivation (SIMD) areas within the same cities, suggests that there are significant local variations in food culture.

- **Greenhouse gas emissions:** Salmon farming has one of the lowest greenhouse gas emissions of any food production system and we believe it should be promoted as a consequence. However, we are unsure of the benefits of including this topic in the food policy, as distinct from the climate change policy where it already features.

- **Food Security:** We wholly concur with the emphasis on food security. We believe it does not feature sufficiently highly in present Scottish Government policy considerations. Moreover, there are specific considerations in regard to UK and EU fish supplies, which in the medium term can only be met by a major increase in fish farming, including oily fish like salmon.

- **Food Waste:** In a world that is short of food, the present levels of food waste in Scotland (and elsewhere in the UK) are socially and economically wholly unacceptable. However, the underlying causes of this waste are complex and addressing them will require significant shifts in the prevailing food retail systems and in the food-education and catering skills of the population in general. This will be no small task.

**Responses to Specific Questions**
1. How important do you think it is that we aim to be a Good Food Nation?
As we have indicated above we are fully supportive of the objectives of the underlying policies, although we believe that the third strand of the policy requires refinement and further development to support its implementation. We are not wholly convinced that the depth and scope of the policy is properly captured by the title ‘Good Food Nation’.

2. How would we know when we had got there? What would success look like?
The general metrics required to evaluate policy strands (1) and (2) have already been developed in the implementation of Recipe for Success: they should be adapted and applied during the next phase of the work. Policy strand (3) is broad based and has multiple objectives. The evaluation metrics adopted should reflect the specific objectives set out in the policy.

3. Do you agree with the proposed vision? How would you improve it?
The vision statement is overly long and reflects some views and aspirations that do not really reflect the text of the document.

4. How would your life be better? What does being a Good Food Nation mean in your locality?
This question appears to be directed at individuals living in different communities. We do not feel it is a question we can address.

5. Are there any other essential steps we need to take before setting out on this journey?
Strand (3) of the policy requires detailed analysis and evaluation to underpin any proposed actions. This is necessary to provide ‘clarity on where we are going’ (see page 20).

6. How do you think a Food Commission could best help?
From the limited details given in the document it will be important for the roles and remit of the ‘Food Commission’ to be carefully considered. It appears that it is more than simply a leadership body and we are unclear how it will be positioned and function alongside the new Food Standards Scotland whose remit would appear to overlap significantly with the Food Commission.

7. In what areas should indicators be set to check we are on track towards our goals?
Please see (2) above.

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?
Different parts of the policy will require different approaches but it seems unlikely that there will be a need for any new legislation. Rather, the policy strands will need a programme of coordinated action, public education and cultural change.

9. Do you agree with the proposed initial focus on:

- **Food in the public sector**
  Yes, this is a good place to start.

- **A children’s food policy**
  We agree there is a strong case for focusing on children (also as agents of change in families). We also agree that the dietary policies and programmes need to be combined in close partnership with programmes to increase physical activity and sports. The latter requires significant additional investment.

- **Local food**
  The document’s thinking in regard to the use of ‘local’ as a food identifier is questionable in that there are many examples of fresh, healthy and environmentally sound foods that do not arise from local production (we will continue to import significant amounts of fruit and vegetables, for example). Likewise, the fact that farmed salmon is grown on the north-west coast and in the islands means that it will not be ‘local’ for many people in Scotland. We are, however, completely supportive of community gardens (allotments) and of farmers markets.

- **Good food choices**
  We concur with the statement in Section 4 (page 23) that factors other than availability or affordability of food often determine food choices. However, we search for meaning in the passage that says: ‘There is a case for simplifying the key and range of delivery mechanisms; reducing radically the current plethora of definitions of what constitutes sustainable food. We should stick closely to an approach based on celebration and class neutrality.’ This passage simply seems to highlight the fact that there should be close interaction with retailers, market specialists, food psychologists, caterers and others at a very early stage of the programme to better understand the drivers of food choice.

- **Continued economic growth?**
  We fully support this section in general and in almost all its specifics. However, the internal inconsistency in seeking a more ambitious export strategy whilst at the same time seeking to shorten supply chains simply re-emphasises the point we have made on ‘local food’ in (9) above.
10. Which other areas would you prioritise?
   We would prioritise: Continued Economic Growth; a Children’s Food Policy (coupled with sport and exercise); and Food in the Public Sector.

11. What other steps toward achieving a Good Food Nation would you recommend?
   A better and fuller understanding of the factors highlighted under Good Food Choices is important in framing future public policy.

12. What else should be considered?
   Specific policy initiatives to promote the health benefits of the Scottish consumption of fish.

13. What steps do you plan to take to help Scotland on the journey towards becoming a good food nation in the next month and in the next 12 months?
   Please visit [http://scottishsalmon.co.uk](http://scottishsalmon.co.uk) and sign up for our publications and media releases.